Virginia Title V Operating Permit

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: American Safety Razor, Inc.

Facility Name: American Safety Razor, Inc.
Facility Location: 1 Razor Blade Lane
Verona, Virginia

Registration Number: 80189
Permit Number: VRO80189

December 27, 2004
Effective Date

December 26, 2009
Expiration Date

R. Bradley Chewning
Director, Department of Environmental Quality

December 27, 2004
Signature Date

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I. Facility Information

Permittee
American Safety Razor, Inc.
1 Razor Blade Lane
Verona, Virginia 24482

Responsible Official
Gary S. Wade
President Industrial & Medical

Facility
American Safety Razor, Inc.
1 Razor Blade Lane
Verona, Virginia 24482

Contact Person
Thomas Gay
Safety and Environmental Coordinator
(540) 245-2234

Plant Identification Number: 51-015-0016

Facility Description:

SIC 3421 - Cutlery

American Safety Razor, Inc. is involved in the manufacturing, assembly, packaging, and warehousing of personal and industrial razor blade products.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
BL1	B1	Keeler Boiler #13106 (Constructed prior to 1972)	19.6 mmBTU/hr	-	-	-	12/15/04
BL2	B2	Keeler Boiler #14335 (Constructed prior to 1972)	13.1 mmBTU/hr	-	-	-	12/15/04
Razor Blade Production Operations							
WB2	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1994)	30 feet/minute	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB4	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1989)	119,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB5	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1989)	119,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB6	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1979)	119,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB8	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1977)	20,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB9	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1979)	20,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB10	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	16,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB11	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	26,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB12	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	60 feet/minute	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB13	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	26,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
WB14	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	24,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB15	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	36,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB16	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1984)	5,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB17	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	20,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB18	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	15,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB19	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	14,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB20	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1972)	24,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB21	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1978)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB22	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1978)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB23	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1982)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB24	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1984)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
WB25	CAUS	TCE Cold Inline Degreasing Unit (Manufactured 1992)	28,000 blades/hr	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
BB1	CAUS	TCE Inline Vapor Degreasing Unit (Manufactured 1972)	11 feet/minute	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04
GRIND	A-W	Razor Blade Grinding (Grinders 1-26)	-	Electrostatic and media filter oil mist eliminators	CD1 – CD26	PM PM-10	12/15/04
STL3 & STL4	CAUS	TCE Distillation Units	200 gallon/hr (each)	Detrex Carbon Adsorption Unit	CAU	TCE VOC	12/15/04

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
HT1-12	-	Heat Treat Pre-Stage Washers (Installed before 1992)	-	-	-	-	12/15/04
COAT1 & COAT2	-	Blade Coating Booths (Installed 1984 & 1995)	1400 blades/hr	-	-	-	12/15/04
INJ1-9	-	Injection Molding Machines	-	-	-	-	12/15/04

*Size/rated capacity is provided for informational purposes only and is not an applicable requirement.

III. Fuel Burning Equipment Requirements – Units # BL1 & BL2

A. Limitations

1. The approved fuels for both Keeler boilers are natural gas and distillate oil. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396-78 "Standard Specification for Fuel Oils". A change in the fuels may require a permit to modify and operate.
   (9 VAC 5-80-110 and Condition 3 of 12/15/04 Permit)

2. The maximum sulfur content of the oil to be burned by both Keeler boilers shall not exceed 0.5 percent by weight per shipment.
   (9 VAC 5-80-110 and Condition 6 of 12/15/04 Permit)

3. Emissions from the operation of the two boilers combined shall not exceed the limits specified below:

Total Suspended Particulate	14.4 lbs/hr	2.1 tons/yr
PM-10	14.4 lbs/hr	1.1 tons/yr
Sulfur Dioxide	86.3 lbs/hr	74.6 tons/yr
Nitrogen Oxides (as NO_2)	4.7 lbs/hr	20.8 tons/yr
Carbon Monoxide	1.2 lbs/hr	5.2 tons/yr
Volatile Organic Compounds	0.1 lbs/hr	0.4 tons/yr

   Annual emissions shall be calculated as the sum of each consecutive twelve (12) month period.
   (9 VAC 5-80-110 and Condition 4 of 12/15/04 Permit)

4. Visible emissions from each Keeler boiler stack shall not exceed twenty percent (20%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A), except during one six-minute period in any one hour in which visible emissions shall not exceed sixty percent (60%) opacity. This condition applies at all times except during startup, shutdown, or malfunction.
   (9 VAC 5-80-110 and Condition 5 of 12/15/04 Permit)

5. Emissions from the Keeler boilers shall be controlled by proper operation and maintenance of combustion equipment. The permittee shall develop, maintain, and have available to all operators written operating procedures and a maintenance schedule for the boilers. These procedures shall be based on the manufacturer's recommendations, at minimum.
(9 VAC 5-80-110 and Condition 7 of 12/15/04 Permit)

B. Monitoring and Recordkeeping

1. The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:

   a. The name of the fuel supplier,

   b. The date on which the oil was received,

   c. The volume of distillate oil delivered in the shipment,

   d. The sulfur content of the oil, and

   e. A statement that the oil complies with the American Society for Testing and Materials specifications for fuel oil numbers 1 and 2.

   (9 VAC 5-80-110 and Condition 6 of 12/15/04 Permit)

2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

   a. The annual throughput of natural gas (in million cubic feet) and distillate oil (in 1000 gallons) for the two Keeler boilers. The annual throughput shall be calculated as the sum of each consecutive twelve (12) month period.

   b. The DEQ approved, pollutant-specific emission factors and the equations used to demonstrate compliance with Condition III.A.3.

   c. All fuel supplier certifications.

   d. Boiler operating procedures and maintenance schedule as required in Condition III.A.5.

   These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
   (9 VAC 5-80-110 and Condition 8 of 12/15/04 Permit)

C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
NO_x	EPA Method 7
SO_2	EPA Method 6
CO	EPA Method 10
PM/PM-10	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

IV. Razor Blade Production Operations Requirements

The following terms and conditions are from 40 CFR 63 Subpart T. A current copy of 40 CFR Part 63 Subpart T has been attached. As used in this section, all terms shall have the meaning as defined in 40 CFR 63.2 and 40 CFR 63.461.

A. Limitations

1. Volatile Organic Compound (VOC) and trichloroethylene emissions from the solvent cleaning system, which is comprised of twenty-two (22) continuous web cleaning machines (Unit # WB2, WB4, WB5, WB6, WB8, WB9, WB10, WB11, WB12, WB13, WB14, WB15, WB16, WB17, WB18, WB19, WB20, WB21, WB22, WB23, WB24, and WB25), one (1) inline vapor degreaser (Unit # BB1), seven (7) trichloroethylene tanks (three (3) storage (Unit # TCE-D, TCE-R, and TCE-V) and four (4) return process (Unit # TCE-R, TCE-R2, TCE-GRV1, and TCE-GRV2)), two (2) distillation units (Unit # STL3 and STL4), and a water treatment system, shall be controlled by a carbon adsorption unit (Unit # CAU). The carbon adsorption unit shall be provided with adequate access for inspection.
(9 VAC 5-80-110 and Condition 9 of 12/15/04 Permit)

2. The permittee shall demonstrate an overall cleaning system control efficiency of seventy percent (70%) or greater for the solvent cleaning system (as outlined in Condition IV.A.1.) using the procedures in Condition IV.B.3.
(40 CFR 63.464 (d) and 9 VAC 5-80-110)

3. Particulate emissions from all grinder stacks (Unit # GRIND) shall be controlled by filterboxes or oil mist collectors. Each filterbox and oil mist collector shall be installed in an accessible location and maintained by the permittee such that it is in proper working order.
(9 VAC 5-80-110)

4. Visible emissions from each razor blade production equipment stack (Stack # CAUS, A - W) shall not exceed twenty percent (20%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, or malfunction.
(9 VAC 5-80-110 and Condition 13 of 12/15/04 Permit)

5. Emissions from razor blade production operations shall not exceed the limits specified below:

Total Suspended Particulate	13.3 lbs/hr	60.0 tons/yr
PM-10	13.3 lbs/hr	60.0 tons/yr

Volatile Organic Compounds	200.0 tons/yr

Annual emissions shall be calculated as the sum of each consecutive twelve (12) month period.
(9 VAC 5-80-110 and Condition 10 of 12/15/04 Permit)

B. Monitoring and Recordkeeping

1. The permittee shall conduct visible emission inspections on each grinder stack (Stack # A - W) in accordance with the following procedures and frequencies:

   a. At a minimum of once per week, the permittee shall determine the presence of visible emissions. If during the inspection, visible emissions are observed, a visible emission evaluation (VEE) shall be conducted in accordance with 40 CFR 60, Appendix A, EPA Method 9, unless timely corrective action is taken such that the stack resumes operation with no visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed twenty percent (20%), the VEE shall be conducted for a total of sixty (60) minutes.

   b. All visible emissions inspections shall be performed when the equipment is operating.

   c. If visible emissions inspections conducted during twelve (12) consecutive weeks show no visible emissions for a particular stack, the permittee may reduce the monitoring frequency to once per month for that stack. Anytime the monthly visible emissions inspections show visible emissions, or when requested by DEQ, the monitoring frequency shall be increased to once per week for that stack.

   All observations, VEE results, and corrective actions taken shall be recorded.
   (9 VAC 5-80-110)

2. The permittee shall measure and record the concentration of trichloroethylene in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. The test shall be conducted while the washboxes are in working mode and are venting to the carbon adsorber. The exhaust concentration shall be determined using the following procedure:

   a. Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of ±25 parts per million by volume.

   b. Use the colorimetric detector tube according to the manufacturer's instructions.

c. Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least eight (8) stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and two (2) stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.

(40 CFR 63.466 (e) and 9 VAC 5-80-110)

3. The permittee shall determine trichloroethylene (TCE) losses by measuring all fluctuating points while the system is in the following condition. The condition will occur on the first working day of each month and will be achieved as follows:

   a. Each Distillation Unit's (Stills) flow will be halted by the removal of the heat source. The inline degreaser will be filled to each sump's operating level which is indicated by a fill line marked on each sump's site glasses. The carbon adsorption unit (Unit # CAU) will not be in the desorption mode. Operating condition of each halogenated solvent cleaning machine will be recorded (filled or empty).

   b. The solvent used by the cleaning system, S_{ai}, is equal to the amount of halogenated HAP liquid solvent added to the solvent cleaning system, plus the change in total solvent in the system during the monthly reporting period. The total solvent in the system is the sum of the following in gallons:

      i) Solvent in the twenty-two (22) continuous web cleaning machines will be based on volume calculations for each halogenated solvent cleaning machine's normal operation level and operating condition (i.e. filled or empty). Normal operating volumes have been calculated for each halogenated solvent cleaning machine based on size and expected liquid levels.

      ii) Solvent in the in-line vapor degreaser will be filled to each sump's operating level that is indicated by a fill line on each sump's site glasses.

      iii) Solvent in the seven (7) tanks will be monitored by liquid level gauges.

      iv) Solvent in the two (2) distillation units - The boiling temperature of each still will be measured on the first working day of each month. The amount of trichloroethylene in the still will be calculated using the boiling temperature of the material in the still and the chart of percent oil by volume versus boiling temperature. The total quantity of trichloroethylene/oil mixture in the still will be read from the site glass.

   c. Determine R_i, the total amount of halogenated HAP liquid solvent recycled to the solvent cleaning machine (system) during the most recent monthly reporting period (kg/month). This value is determined by totalizing monitors that have

been installed in the effluent line of the carbon adsorption system. This reading represents all TCE reclaimed through the unit in that report month.

d. The overall cleaning system control efficiency (E_o) will be determined using Equation 1 as follows:

$$E_o = R_i / (R_i + (S_{ai} - SSR_i)) \qquad \text{Equation 1}$$

Where:

E_o = overall cleaning system control efficiency

R_i = the total amount of halogenated HAP liquid solvent recycled to the solvent cleaning machine (system) during the most recent monthly reporting period, i, (kilograms of solvent per month). This value is determined by totalizing monitors that have been installed in the effluent line of the carbon adsorption unit (CAU). This reading will represent all trichloroethylene reclaimed through the unit in that report month.

S_{ai} = the amount of halogenated HAP liquid solvent added to the solvent cleaning system, plus the change in total solvent in the system during the monthly reporting period, i, (kilograms of solvent per month).

SSR_i = the total amount of halogenated HAP liquid solvent removed from the solvent cleaning system in the form of solid waste during the most recent monthly reporting period, i, (kilograms of solvent per month). The total amount of HAP solvent being removed will be calculated from temperature and level readings taken at each still prior to removal from the system.

(40 CFR 63.465 and 9 VAC 5-80-110)

4. The permittee shall maintain records, in either electronic or written form, of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Region. These records shall include, but are not limited to:

a. Monthly and annual throughput and emissions of VOCs (in pounds) used in razor blade production operations. Annual throughput and emissions shall be calculated as the sum of each consecutive twelve (12) month period.

b. Monthly and annual throughput and emissions of trichloroethylene (in pounds) used in razor blade production operations. Annual throughput and emissions shall be calculated as the sum of each consecutive twelve (12) month period.

c. Monthly and annual emissions of particulates (in pounds) from the razor blade production operations. Annual emissions shall be calculated as the sum of each consecutive twelve (12) month period.

d. Inspection records as required in Condition IV.B.1.

e. The log of weekly outlet trichloroethylene concentration tests on the carbon adsorber (Unit # CAU) as required in Condition IV.B.2.

f. The dates and amounts of solvent that are added to the solvent cleaning system.

g. The dates and amounts of solvent that are recovered from the desorption of the carbon adsorber system.

h. The solvent composition of wastes, SSR_i, removed from the cleaning system as determined either by tests conducted using EPA reference method 25d or by engineering calculations included in the compliance report.

i. Calculation sheets showing the calculation and results of determining the overall cleaning system control efficiency, as required by Condition IV.B.3.d.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.
(40 CFR 63.467(e), 9 VAC 5-80-110 and Condition 12 of 12/15/04 Permit)

C. Testing

1. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a, 25d
PM/PM-10	EPA Methods 5, 17, 202
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

1. The permittee shall submit a solvent emission report to DEQ and EPA annually. The solvent emission report shall contain the following information:

   a. The size and type of each unit subject to this subpart (solvent/air interface area or cleaning capacity).

b. The average monthly solvent consumption for the solvent cleaning machine in kilograms per month.

c. The 3-month monthly rolling average solvent emission estimates calculated each month using the method as described in Condition IV.B.3.

(40 CFR 63.468 (g) and 9 VAC 5-80-110)

2. The permittee shall submit an exceedance report to DEQ and EPA semiannually except when, the Director, Valley Region, determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under Condition IV.D.3. is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the following applicable information:

   a. If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

   b. If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

   (40 CFR 63.468 (h) and 9 VAC 5-80-110)

3. If required to submit an exceedance report on a quarterly (or more frequent) basis, the permittee may reduce the frequency of reporting to semiannual if the following conditions are met:

   a. The permittee has demonstrated a full year of compliance without an exceedance.

   b. The permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63 Subpart A (General Provisions) and in 40 CFR 63 Subpart T.

   c. The Director, Valley Region, does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of 40 CFR 63 Subpart A (General Provisions).

   (40 CFR 63.468 (i) and 9 VAC 5-80-110)

V. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
FP1	Grinnell Fire Pump (diesel)	9 VAC 5-80-720 C	-	290 HP
EMG	Emergency Generator (natural gas)	9 VAC 5-80-720 C	-	150 KVA
EMGL	Emergency Generator (natural gas)	9 VAC 5-80-720 C	-	66 KVA
BTU1 & BTU2	Sintering BTU Furnaces (electric)	9 VAC 5-80-720 B	PM PM-10	-
TCE-D, TCE-R, TCE-V	TCE Storage Tanks	9 VAC 5-80-720 B	TCE VOC	-
03D1, 03D2, 03D3	Process Tanks	9 VAC 5-80-720 B	VOC	-
FPUMP, #2 FUEL	#2 Fuel Oil Storage Tanks	9 VAC 5-80-720 B	VOC	-
GAS	Gasoline Storage Tank	9 VAC 5-80-720 B	VOC	-
VAR-W, VAR-V	Mineral Spirits Storage Tanks	9 VAC 5-80-720 B	VOC	-
TCE-R, TCE-R2, TCE-GRV1, TCE-GRV2	TCE Return Process Tanks	9 VAC 5-80-720 B	TCE VOC	-
API/STRP	API Oil Water Separator and Air Stripper for Water from Remediation Wells and No. 2 Lagoon	9 VAC 5-80-720 B	TCE VOC	-
HTF	Twelve (16) Electric Heat Treating Furnaces	9 VAC 5-80-720 B	VOC	-
PC	Four (4) Parts Cleaners (petroleum solvent)	9 VAC 5-80-720 B	VOC	-
DEP	Double Edge Printer	9 VAC 5-80-720 B	VOC	-
ROTG	Eight (8) Rotary Grind Machines	9 VAC 5-80-720 B	PM PM-10	-
Pp	Perforating Presses	9 VAC 5-80-720 B	VOC	-
RI	Rust Inhibitor – Kerosene based	9 VAC 5-80-720 B	VOC Glycol Ether	-

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

VI. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
None Identified	-	-

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

VII. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant to section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

(3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the board may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street

Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Valley Region within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition VII.C.3. of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Valley Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Valley Region.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit

termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
   (9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
   (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for

the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

b. The permitted facility was at the time being properly operated.

c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any

requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

   (9 VAC 5-80-110 I)